1 JASON M. FRIERSON United States Attorney District of Nevada Nevada Bar Number 7709 3 PENELOPE J. BRADY Assistant United States Attorneys 400 South Virginia Street, Suite 900 Reno, Nevada 89501 5 (775) 784-5438 penelope.brady@usdoj.gov 6 Representing the United States of America 7 UNITED STATES DISTRICT COURT 8 **DISTRICT OF NEVADA** 9 UNITED STATES OF AMERICA, Case No. 2:20-cr-00091-JCM-DJA 10 STIPULATION TO EXTEND TIME Plaintiff, TO FILE RESPONSE TO MOTION 11 v. FOR NEW TRIAL [ECF #305] 12 JOHN MATTHEW CHAPMAN, (First Request) 13 Defendant. 14 IT IS HEREBY STIPULATED AND AGREED by and through Jason M. 15 Frierson, United States Attorney for the District of Nevada, Penelope J. Brady, Assistant 16 United States Attorney, counsel for the United States of America, and Chris Frey, 17 Assistant Federal Public Defender, counsel for Defendant John Matthew Chapman, to 18 extend the time in which the Government's Response to the Defendant's Motion for New 19 Trial [ECF #305] is due from May 29, 2024 to May 30, 2024. Defendant's Replies to the 20 Government's Response would be then due on June 7, 2024. This is the first request for an 21 extension. Government counsel is respectfully requesting an additional one day to file its 22 response due to government counsel's other obligations and the weekday holiday within 23 the response period. As such, the parties are stipulating to a short extension of one day. 24

1	Additionally, the parties are stipulating that Defendant will have until June 7, 2024 to file	
2	his reply. The additional time requested for the filing the responses is requested mindful of	
3	the current sentencing date of August 2, 2024, the exercise of due diligence, in the interests	
4	of justice, and not for any purpose of delay.	
5	DATED: May 28, 2024	
6 7	JASON M. FRIERSON United States Attorney	RENE L. VALLADARES Federal Public Defender
8	/s/ Penelope J. Brady PENELOPE J. BRADY Assistant United States Attorney	/s/ Chris Frey CHRIS FREY
9		Assistant Federal Public Defender Counsel for John Matthew Chapman
10	IT IS SO ORDERED.	
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12	DATED: May 29, 2024	
13		Xellus C. Mahan
14		HON JAMES C. MAHAN UNITED STATES DISTRICT JUDGE
15		CIVILD STATES DISTRICT VODGE
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